

April 24, 2013

Ms. Karen O'Brien USEPA Region II 290 Broadway – 24th Floor New York, New York 10007-1866

Subject:

Request for Pre-Application Meeting for the Aguirre Gasport Project National Pollutant Discharge Elimination System (NPDES) Permit for Offshore Operations from Aguirre, Puerto Rico

Dear Ms. O'Brien:

Aguirre Offshore GasPort, LLC ("AOGP"), a wholly owned subsidiary of Excelerate Energy L.P. ("Excelerate Energy") is proposing to develop, construct, and operate the Aguirre Offshore GasPort Project (Project) to be located in Salinas, along the southern shore of the Commonwealth of Puerto Rico in Commonwealth waters. The Project is being developed in cooperation with the Puerto Rico Electric Power Authority ("PREPA") for the purpose of receiving and storing liquefied natural gas ("LNG") to be acquired by PREPA, regasifying the LNG, and delivering natural gas to PREPA's existing Aguirre Power Complex ("Aguirre Plant"). Pursuant to Section 3 of the Natural Gas Act ("NGA"), as amended, and Parts 153 and 380 of the regulations of the Federal Energy Regulatory Commission ("FERC"), AOGP recently filed an application to the FERC for authorization to site, construct and operate the Project.

The Project will utilize Excelerate Energy's proven Energy Bridge™ technology to receive, store and vaporize LNG for delivery as natural gas utilizing one of Excelerate Energy's existing Energy Bridge Regasification Vessels (EBRVs) functioning as a floating storage and regasification unit (FSRU). The FSRU will have a storage capacity of approximately 150,900 m3 of LNG. The FSRU for the proposed Project will utilize the closed-loop vaporization mode during LNG vaporization which will not require direct seawater intake or discharge for LNG vaporization. LNG will be delivered to the Project via LNG carriers (LNGCs), unloaded and stored within an FSRU, regasified on the FSRU, and delivered directly to the Aguirre Plant by a subsea pipeline.

Standard vessel operations will require seawater use, whether the FSRU is in standby mode or vaporization mode. Seawater for all onboard use is withdrawn through the FSRU's sea chests. While no seawater intake or discharge is used for the regasification process, the normal water use requirements of an FSRU is up to approximately 56 million gallons per day (MGD) at an intake rate of approximately 0.45 fps. Of this volume, up to approximately 54 million gallons are used to support machinery cooling and the operation of the vessel's safety water curtain and then discharged. The remaining volume, up to approximately 2 MGD, is retained as ballast water and water to support crew needs (e.g., sanitary needs and potable water). The exact amount of ballast water needed for the FSRU on a daily basis will vary to compensate for the change in draft of the vessel as natural gas is sent out and LNG is transferred onboard. The preliminary FSRU water balance diagram is attached to further identify the various water uses and discharges. The withdrawal of seawater and discharge to marine waters would constitute a permitted

Ms. Karen O'Brien USEPA Region II Page 2

activity under a surface water National Pollutant Discharge Elimination System (NPDES) program permit.

Before the NPDES permit application is submitted for consideration by the U.S. Environmental Protection Agency (USEPA), we believe a pre-application meeting would be beneficial to verify the permit framework regarding this unique project. With the recent filing of the FERC application, you will soon have access to the various Resource Reports that constitute the required Environmental Report for the Project. In particular, Resource Report 2 – Water Use and Quality provides significant detail regarding water intake and discharge characteristics, including the thermal plume modeling results.

Please contact me at your earliest convenience to discuss the pre-application meeting materials and to identify a date and time for our discussion. You can reach me at (973) 630-8530 or via email at John.Schaffer@tetratech.com to arrange a mutual date and time. I look forward to hearing from you.

Sincerely.

ohn Schaffer

Principal Ecologist/Project Manager

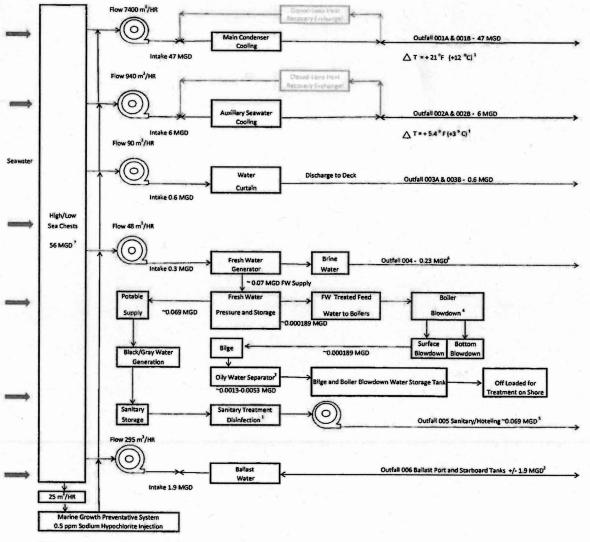
Enc: Aguirre GasPort FSRU preliminary water balance diagram

cc: Lingard Knutson, USEPA Region II

Mike Trammel, Excelerate Energy

Ivelisse C. Sánchez Soultaire, Esq., PREPA

Craig Wolfgang, Tetra Tech



## Notes

- 1 Water withdrawal and discharge based on closed loop and FRSU vessel readiness operation during regasification
- 2 Ballast water will vary significantly. Value based on Northeast Gateway Projectwith regasification process and on-board storage capacity of the FSRU and may cycle volumes of up to 10,000 m/hr.
- 3 On-board gray/black water treatment and disinfection prior to discharge
- 4 Assumes that 2- Main Bollers have maximum volume of 3,100 gallons each and auxiliary boller has maximum volume of 310 gallons
- 5 Assumes a sanitary generation rate of 0.069 MGD for 100 member crew
- 6 Volume of discharge dependent upon daily potable supply and demand needs
- 7 An additional 960 m<sup>1</sup>/HR for emergency fire control system via emergency sea chest. Withdrawal only for emergency use.

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## Aguirre Gas Port LNG Project EPA Region II/CEPD

## National Pollutant Discharge Elimination System Permitting USEPA Region II, 290 Broadway, New York City, New York 24<sup>th</sup> Floor, Room 2429 May 23, 2013, 1 pm

## Agenda

- 1) Introductions All
- 2) Meeting Objectives
  - a. To familiarize EPA/CEPD permitting specialists with the key project components for water use and discharges associated with the project - Ernie Ladkani (Excelerate Energy (EE))
  - b. To initiate the NPDES permitting process and gain shared vision with permitting requirements and needs to facilitate the permitting process Ernie Ladkani (EE)
  - c. Identify key project and regulatory personnel involved in the NPDES permit process, the review cycle and schedule needs for the permit Ernie Ladkani (EE)
- 3) General Overview of Facilities Ernie Ladkani (EE)/Bobby Olsen (EE)/Marc Bizier(EE)
  - a. Proposed Pipeline
  - b. Marine Gas Port Mooring Facility
  - c. FSRU
- 4) Discussion of Water Use John Schaffer (TT), Tim Feehan (TT), Bobby Olsen (EE), Marc Bizier(EE)
  - a. Withdrawal
    - i. Hydrostatic test water J Schaffer (TT)/EE
    - ii. Gas Port Platform
    - iii. FSRU Cooling water, service water, ballast J Schaffer (TT), All
      - 1. Sea Chest Intake Design Bobby Olsen (EE)/Marc Bizier(EE)
    - iv. LNGCs J. Schaffer (TT)
    - v. Section 316(b) Impingement and Entrainment J Schaffer (TT)/T. Feehan (TT)
    - vi. Biofouling Control Marine Growth Prevention Systems (MGPS) J. Schaffer (TT), EE
  - b. Discharges
    - Cooling water (Main and Auxiliary) J.Schaffer (TT)/T. Feehan (TT), EE
      - 1. Thermal Assessment J Schaffer
    - ii. Water Curtain -John Schaffer (TT), EE
    - iii. Sanitation John Schaffer (TT), EE
    - iv. Bilge/Boiler Blow down John Schaffer (TT), EE
    - v. Ballast -- John Schaffer (TT), EE
    - vi. Stormwater John Schaffer (TT),EE
    - vii. Fire Water Control Test Water JohnSchaffer (TT), EE
- 5) NPDES Permitting Application Needs -J Schaffer/T. Feehan (TT)
  - a. NPDES Form 1 Details and Specifications
  - b. Form 2D/2E Non-process, Cooling Water and Sanitation
    - i. Continuous vs. Discontinuous Discharges
    - ii. Stormwater Requirements
- 6) Wrap Up

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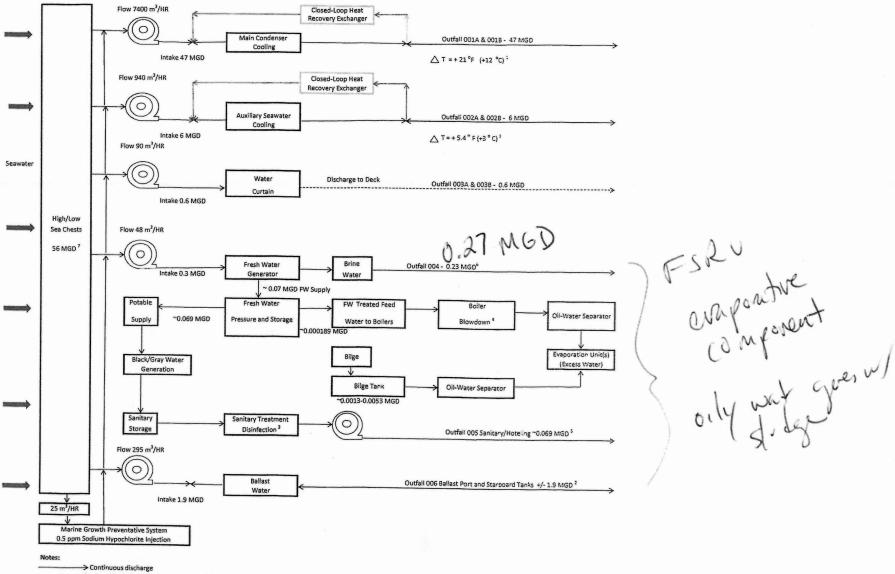
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---->Intermittent discharge based on regasification schedule

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